

**IN THE UNITED STATES COURT OF FEDERAL CLAIMS
BID PROTEST**

AMAZON WEB SERVICES, INC.,

Plaintiff,

v.

UNITED STATES OF AMERICA,
by and through the U.S. Department of Defense,

Defendant,

and

MICROSOFT CORPORATION,

Defendant-Intervenor.

Case No. 19-cv-01796

Judge Campbell-Smith

PLAINTIFF AMAZON WEB SERVICES, INC.'S

MOTION TO COMPLETE THE ADMINISTRATIVE RECORD


Pursuant to Rule 7 and Appendix C of the Rules of the Court of Federal Claims, Plaintiff Amazon Web Services, Inc. (“AWS”) respectfully requests that the Court direct Defendant to complete the administrative record (“AR”) in the above-captioned bid protest. As set forth more fully in the accompanying Memorandum of Points and Authorities in Support, the compendium of documents that the Government submitted as the AR is incomplete as presented. That compendium is missing whole categories of information that DoD generated, developed, considered, or reviewed during the course of the remand evaluations and September 2020 re-award, and omits materials underlying the original evaluations and award decision, including documents that this Court expressly required to be included in the AR. Without completing the AR through the inclusion of the missing materials set forth in the accompanying Memorandum of Points and Authorities in Support, the Government’s AR is incomplete and cannot be relied upon

by the Court to facilitate meaningful and effective judicial review. Accordingly, AWS respectfully requests the Court GRANT this Motion.

Defendant, the United States, and Defendant-Intervenor, Microsoft Corporation, oppose this motion.

Dated: June 18, 2021

Respectfully submitted,

By: 

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